
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

: CRIMINAL COMPLAINT

v.

:
: Mag. No. 21-6013 (DEA)

JOEL PEREZ-NAJERA,
a/k/a "Joel Anibal Perez-Najera,"
a/k/a "Joel Perez"

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RECEIVED
MARCH 17, 2021
At: 8:30 PM
XX12:05PM
WILLIAM T. WALSH
CLERK

I, Romeo Lopez, the undersigned complainant being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Deportation Officer with the United States Department of Homeland Security, Immigrations and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT B


continued on the attached pages and made a part hereof.

S/ROMEO LOPEZ

Romeo Lopez
Deportation Officer
Immigration and Customs Enforcement
United States Department of Homeland Security

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1(b)(2)(A)
on March 17, 2021,
in the District of New Jersey

HONORABLE DOUGLAS E. ARPERT
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

On or about February 21, 2021, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

JOEL PEREZ-NAJERA,
a/k/a “Joel Anibal Perez-Najera,”
a/k/a “Joel Perez,”

being an alien who was deported and removed and had departed the United States while an order of deportation and removal was outstanding subsequent to his conviction for the commission of an aggravated felony, and thereafter, without the express consent of the Secretary of Homeland Security of the United States to reapply for admission prior to his reembarkation at a place outside the United States, did knowingly and voluntarily enter and was found in the United States.

In violation of Title 8, United States Code, Sections 1326(a) and (b)(2).

ATTACHMENT B

I, Romeo Lopez, am a Deportation Officer with the Department of Homeland Security, Immigration and Customs Enforcement. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and part. Because this criminal complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

1. The defendant, JOEL PEREZ-NAJERA, a/k/a “Joel Anibal Perez-Najera,” a/k/a “Joel Perez,” (hereafter “PEREZ-NAJERA”) is a native and citizen of Guatemala and is not a citizen of the United States.

2. On or about March 10, 2011, PEREZ-NAJERA was convicted of an aggravated felony in the Superior Court of Connecticut, Judicial District of Stamford/Norwalk, of burglary, third degree, in violation of C.G.S.A. § 53a-103, and he was sentenced to three years’ imprisonment.

3. Following this conviction, on or about November 10, 2011, PEREZ-NAJERA was ordered removed from the United States to Guatemala by an Immigration Judge.

4. On or about September 27, 2012, PEREZ-NAJERA was removed from the United States to Guatemala while the above-referenced order of removal was outstanding.

5. Following his removal, PEREZ-NAJERA re-entered the United States without permission on an unknown date. On or about February 21, 2021, PEREZ-NAJERA was arrested in or around Trenton, New Jersey, by officers of the Trenton Police Department, and was charged with two counts of simple assault, in violation of N.J.S.A. § 2C: 12-1a(1).

6. A fingerprint analysis revealed that PEREZ-NAJERA is the same individual who was convicted of the aggravated felony offense set forth in paragraph 2, above, and who was removed from the United States to Guatemala, as set forth in paragraph 4 above.

7. A review of relevant databases revealed that the Secretary of Homeland Security of the United States did not expressly consent to PEREZ-NAJERA reapplying for admission to the United States prior to his reembarkation at a place outside the United States, or his reentry into the United States.